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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 MARIA MAGDALENA MENDOZA,  
15 Defendant.

Case No. 2:20-cr-00212-GMN-BNW

**STIPULATION TO CONTINUE**  
**MOTION DEADLINES**  
(Fifth Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
18 Acting United States Attorney, and Simon F. Kung, Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, Brian Pugh,  
20 Assistant Federal Public Defender, counsel for Maria Magdalena Mendoza, that the pretrial  
21 motion deadline currently due on October 15, 2021, be continued to December 3, 2021.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
23 shall have to and including December 17, 2021, to file any and all responsive pleadings.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including December 27, 2021, to file any and all replies to dispositive motions.

26 The Stipulation is entered into for the following reasons:

1           1.       On October 12, 2021, the defense received new discovery and needs additional  
2 time to review discovery and determine whether to file pretrial motions.

3           2.       The defendant is not incarcerated and does not object to the continuance.

4           3.       The parties agree to the continuance.

5           4.       The additional time requested herein is not sought for purposes of delay, but  
6 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
7 complete investigation of the discovery materials provided.

8           5.       Additionally, denial of this request for continuance could result in a miscarriage  
9 of justice.

10          This is the fifth stipulation to continue filed herein.

11          DATED this 15<sup>th</sup> day of October 2021.

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13          RENE L. VALLADARES  
14          Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

15          By /s/ Brian Pugh

By /s/ Simon F. Kung

16          BRIAN PUGH  
17          Assistant Federal Public Defender

SIMON F. KUNG  
Assistant United States Attorney

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MARIA MAGDALENA MENDOZA,  
Defendant.

## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- ## ORDER

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1 IT IS FURTHER ORDERED that the parties shall have to and including December 27,  
2 2021 to file any and all replies.  
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6 **IT IS SO ORDERED**

7 **DATED:** 9:47 am, October 18, 2021  
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10 **BRENDA WEKSLER**  
11 **UNITED STATES MAGISTRATE JUDGE**  
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